

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA, :  
 :  
 :  
 v. : No. 17 Cr. 357 (LAK)  
 :  
 DAVID BLASZCZAK, :  
 THEODORE HUBER, :  
 ROBERT OLAN, and :  
 CHRISTOPHER WORRALL, :  
 :  
 Defendants. :  
 :  
-----X

**DECLARATION OF STEPHEN FISHBEIN IN SUPPORT OF  
DEFENDANTS CHRISTOPHER WORRALL AND DAVID  
BLASZCZAK'S JOINT MOTION *IN LIMINE* TO EXCLUDE EVIDENCE  
UNDER FEDERAL RULE OF EVIDENCE 403  
AND TO STRIKE PARAGRAPH 25(b) OF THE INDICTMENT**

STEPHEN FISHBEIN, pursuant to 28 U.S.C. § 1746, hereby declares under the penalty of perjury as follows:

1. I am a partner of the New York office of the law firm Shearman & Sterling LLP, counsel for Christopher Worrall, defendant in these proceedings. I submit this Declaration in support of the Motion of defendants Christopher Worrall and David Blaszczak for an order excluding from trial irrelevant and prejudicial material, and striking paragraph 25(b) from the Superseding Indictment.

2. Attached as Exhibit A is a true and correct copy of a series of text messages exchanged by Blaszczak and Worrall on August 9, 2014.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 23rd day of March, in the year 2018, in New York, New York.

Dated: New York, New York  
March 23, 2018

Respectfully submitted,

/s/ Stephen Fishbein

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# **EXHIBIT A**

*(Redacted)*